

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JULIE ANNE STAMPS,)	
)	
Plaintiff,)	Case No. 3:21-cv-00746
)	
v.)	District Judge Trauger
)	
THE LAMPO GROUP, LLC,)	Jury Demand
)	
Defendant.)	

DEFENDANT’S MOTION TO EXTEND DISCOVERY RESPONSE DEADLINES

Defendant, The Lampo Group, LLC, by and through the undersigned counsel, moves the Court to extend its deadlines to respond to Plaintiff’s First Set of Interrogatories and First Requests for Production of Documents from January 24, 2022 to February 28, 2022. In support of this motion, Defendant states the following:

1. This is an employment case.
2. Plaintiff’s employment with Defendant ended in July 2020.
3. On August 25, 2021, Plaintiff filed a bankruptcy petition under Chapter 13 of the United States Bankruptcy Code, *In re: Julie Anne Stamps*, Case No. 3:21-bk-02597, in the U.S. Bankruptcy Court for the Middle District of Tennessee. A copy of Plaintiff’s bankruptcy petition is attached as Exhibit 1.
4. On September 29, 2021, Plaintiff filed a complaint against Defendant (Doc. #1).
5. On September 30, 2021, Plaintiff amended her bankruptcy schedules to add this lawsuit as an asset. Copies of Plaintiff’s amended bankruptcy schedules are attached as Exhibit 2.
6. On October 13, 2021, Plaintiff moved the bankruptcy court for authorization to

- employ her attorneys in this case. A copy of Plaintiff's motion is attached as Exhibit 3.
7. Plaintiff's motion to employ her attorneys is still pending before the bankruptcy court. A hearing has been set for January 26, 2022. A copy of the bankruptcy court's scheduling order is attached as Exhibit 4.
 8. The parties discussed these bankruptcy issues with the Court during the initial case management conference on December 6, 2021. Defendant also reported that it was engaged in active settlement discussions with the bankruptcy trustee.
 9. In the Initial Case Management Order, the Court extended the parties' deadline to exchange Rule 26(a)(1) initial disclosures to February 28, 2022, the Monday following the February 22, 2022 claims bar date for governmental units. (Doc. #14). A copy of the Form 309I issued in Plaintiff's bankruptcy case is attached as Exhibit 5.
 10. However, on December 22, 2021, Plaintiff served her First Set of Interrogatories and Requests for Production of Documents to Defendant via e-mail.
 11. Defendant's responses to Plaintiff's discovery requests are due today, January 24, 2022.
 12. Defendant remains engaged in active settlement negotiations with the bankruptcy trustee and believes that a resolution is imminent. Upon information and belief, the bankruptcy trustee is also actively communicating with Plaintiff regarding settlement.
 13. Given Defendant's belief that settlement is imminent, the fact that Plaintiff's motion to employ her attorneys in this case remains pending before the bankruptcy court, and the fact that initial disclosures are not even due to be exchanged until February 28, 2022, Defendant does not believe that Plaintiff's discovery requests are proper nor

- that it is reasonable at this juncture for Defendant to be required to respond to them.
14. Therefore, Defendant would like to extend its deadlines to respond to Plaintiff's First Set of Interrogatories and Requests for Production of Documents to February 28, 2022, the same date by which initial disclosures must be exchanged.
15. By February 28, 2022, Defendant believes that this case will be fully resolved or, alternatively, the bankruptcy court will have ruled on Plaintiff's motion to employ her attorneys and we will have a much better idea about how this case will proceed.
16. This extension will not impact any other deadlines in this case. Nor will Plaintiff be prejudiced by the extension given that the initial disclosure deadline is February 28, 2022 and the fact discovery deadline is November 23, 2022.

In light of the foregoing, Defendant moves the Court to extend its deadlines to respond to Plaintiff's First Set of Interrogatories and Requests for Production of Documents to February 28, 2022.

Respectfully submitted,

/s/Daniel Crowell

Leslie Sanders (TN #18973)

Daniel Crowell (TN #31485)

JACKSON LEWIS P.C.

CitySpace

611 Commerce Street

Suite 3102

Nashville, TN 37203

Telephone: (615) 915-3300

leslie.sanders@jacksonlewis.com

daniel.crowell@jacksonlewis.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that, on January 24, 2022, I filed *Defendant's Motion to Extend Discovery Response Deadlines* via the Court's electronic filing system, which will automatically notify and send a copy of that filing to:

Heather Moore Collins
Anne Bennett Hunter
Ashley Shoemaker Walter
Caroline Drinnon
Collins & Hunter PLLC

Attorneys for Plaintiff

/s/Daniel Crowell
Daniel Crowell (TN #31485)
Attorney for Defendant